

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INSULATORS AND ASBESTOS WORKERS)
LOCAL NO. 14 PENSION FUND,)
Derivatively on Behalf of 3M COMPANY,)

Plaintiff,)

v.)

GEORGE W. BUCKLEY, LINDA G.)
ALVARADO, VANCE D. COFFMAN,)
MICHAEL L. ESKEW, W. JAMES)
FARRELL, HERBERT L. HENKEL,)
EDWARD M. LIDDY, ROBERT S.)
MORRISON, AULANA L. PETERS,)
ROZANNE L. RIDGEWAY, PATRICK D.)
CAMPBELL, MOE S. NOZARI,)
FREDERICK J. PALENSKY, RICHARD F.)
ZIEGLER,)

Defendants,)

and)

3M COMPANY, a Delaware Corporation,)

Nominal Defendant.)

C.A. No. 07-416-GMS

JURY TRIAL DEMANDED

STIPULATION AND ORDER TO EXTEND TIME

WHEREAS, on September 10, 2007, defendants filed Motions to Dismiss this action pursuant to Federal Rules of Civil Procedure 12(b)(6) and 23.1 (D.I. 26 and 28), and defendants filed a separate Motion to Transfer this action to the District of Minnesota (D.I. 23);

WHEREAS, plaintiff filed and served its answering briefs in opposition to defendants' Motions on October 11, 2007,

WHEREAS, defendants having a need for two additional weeks for the preparation of their reply briefs with respect to the foregoing motions, and if the Court would prefer a more

detailed explanation of the need for the further extension, counsel being available at the Court's convenience for a conference with the Court;

IT IS HEREBY STIPULATED AND AGREED among the parties, subject to the approval of the Court, that the time within which defendants shall file and serve their reply briefs in support of defendants' motions to (1) dismiss this action pursuant to Federal Rule of Civil Procedure 12(b)(6) (D.I. 26); (2) dismiss this action pursuant to Federal Rule of Civil Procedure 23.1 (D.I. 28); and (3) to transfer this action to the District of Minnesota (D.I. 23) is extended to and including December 19, 2007.

RIGRODSKY & LONG, P.A.

OF COUNSEL:

A. Arnold Gershon
Regina M. Calcaterra
Gloria Kui
BARRACK, RODOS & BACINE
1350 Broadway, Suite 1001
New York, NY 10018
(212) 688-0782

Daniel E. Bacine
BARRACK, RODOS & BACINE
3300 Two Commerce Square
2001 Market Street
Philadelphia, Pennsylvania 19103
(215) 963-0600

/s/ Seth D. Rigrodsky #3147

Seth D. Rigrodsky (#3147)
sdr@rigrodskylong.com
Brian D. Long (#4347)
bdl@rigrodskylong.com
Rigrodsky & Long, P.A.
919 North Market Street, Suite 980
Wilmington, DE 19801
(302) 295-5310

*Attorneys for Insulators and Asbestos
Workers Local No. 14 Pension Fund*

RICHARDS, LAYTON & FINGER, P.A.

OF COUNSEL:

Paul H. Dawes
LATHAM & WATKINS LLP
140 Scott Drive
Menlo Park, CA 94025
(650) 328-4600

J. Christian Word
Kevin H. Metz
LATHAM & WATKINS LLP
555 Eleventh Street, N.W.
Washington, DC 20004
(202) 637-2200

/s/ Steven J. Fineman #4025

Daniel A. Dreisbach (#2583)

dreisbach@rlf.com

Steven J. Fineman (#4025)

fineman@rlf.com

Geoffrey G. Grivner (#4711)

grivner@rlf.com

One Rodney Square

Wilmington, DE 19801

(302) 651-7700

*Attorneys for 3M Company, Linda G.
Alvarado, Vance D. Coffman, Michael L.
Eskew, W. James Farrell, Herbert L. Henkel,
Edward M. Liddy, Robert S. Morrison,
Aulana L. Peters, and Rozanne L. Ridgway*

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Thomas F. Ryan
Walter C. Carslon
James W. Ducayet
Sharlene P.B. Hobson
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603
(312) 853-7000

/s/ Philip A. Rovner #3215

Philip A. Rovner (#3215)

provner@potteranderson.com

Hercules Plaza

Wilmington, DE 19801

(302) 984-6000

*Attorneys for George W. Buckley, Patrick D.
Campbell, Moe S. Nozari, Frederick J.
Palensky, and Richard F. Ziegler*

SO ORDERED this _____ day of _____, 2007.

United States District Judge